

The Honorable Christopher M. Alston
Chapter 11
Hearing Date: Friday, February 9, 2018
Hearing Time: 9:30 am
Hearing Location: Seattle, Rm. 7206
Response Date: February 5, 2018

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re
NORTHWEST TERRITORIAL MINT, LLC,
Debtor.

No. 16-11767-CMA

Interested Parties' Gary Marks, Heidi Wastweet and New York Numismatic Club's **Supplemental** Limited Objection to Trustee's Motion to Sell Estate Property Free and Clear of Liens and Motion to Return Property

Comes now, Gary Marks, Heidi Wastweet and New York Numismatic Club (collectively the “Interested Parties”), Interested Parties in the above-referenced matter, by and through their attorney, Michelle Carmody Kaplan, of Kaplan Law PLLC, and hereby Supplement the Limited Objections to the Chapter 11 Trustee’s Motion to Sell Estate Property Free and Clear of Liens, 11 U.S.C. §363(f) (ECF No. 1350)(the “Motion”) filed by each Interested Party on February 5, 2018 (ECF Nos. 1406 & 1408, respectively).

The Interested Parties further object to the Motion on the basis that the Trustee did not provide notice of the Motion, which purports to sell disputed assets, to all prior customers whose dies are stored by NWTM and might claim an interest in them. Since filing the Objections late Monday night, the undersigned has been contacted by another similarly situated Interested Party who was never served with a copy of the Motion. This begs the question how many other NWTM customers (past and present) believe that the dies at NWTM belong to them and are not property of the Bankruptcy Estate. Per NWTM's marketing materials, *see Exhibits F & G* attached to the *Declaration of Gary B. Marks* (ECF No. 1412), NWTM has

Interested Parties' Limited Objection to Sale Motion - 1

KAPLAN LAW PLLC

2155 - 112th Ave NE

2155 112 Ave. N.E.
Bellevue, WA 98004

Bellevue, WA 98004
Phone: 425-818-4818

— Fax: 425-484-4444

1 been providing minting services since 1903 and is storing “309,405 ... meticulously archived”
2 dies.

3 The undersigned is also aware that the Trustee is working on a separate motion
4 regarding the ownership of the dies at NWTM. The Interested Parties suggest that the Motion
5 be continued until after the Court decides whether the dies are, in fact, property of the
6 Bankruptcy Estate. Further, notice of any such motion should be sent to all customers whose
6 dies are stored by NWTM.

7
8 DATED this 7th day of February 2018.
9

10 **KAPLAN LAW PLLC**
11

12 By */s/ Michelle Carmody Kaplan*
13 Michelle Carmody Kaplan
13 WSBA No. 27286
14 Attorney for Marks, Wastweet and
14 NYNC
15
16
17
18
19
20
21
22
23
24
25
26

Interested Parties' Limited
Objection to Sale Motion - 2

KAPLAN LAW PLLC

2155 - 112th Ave. NE

Bellevue, WA 98004

Phone: 425-818-4818

Fax: 425-484-4444